

**UNITED STATES DISTRICT COURT
EASTERN DISTRICT OF NEW YORK**

IN RE AKAZOO S.A. SECURITIES
LITIGATION

Case No. 1:20-cv-01900-BMC

CLASS ACTION

**NOTICE OF MOTION FOR: (I) PRELIMINARY APPROVAL OF PARTIAL CLASS
ACTION SETTLEMENT WITH CROWE U.K. LLP; (II) CERTIFICATION
OF THE SETTLEMENT CLASS; AND (III) APPROVAL OF
DISSEMINATION OF NOTICE TO THE SETTLEMENT CLASS**

Lead Plaintiffs Tim Caldwell, Sharon Caldwell, Nikolaos Poulakis, and John Pullen, along with plaintiffs Eva Pareja and Greg Sweet in the recently voluntarily dismissed action as part of the Akazoo Settlement titled, *Pareja, et al., v. Apostolos N. Zervos, et al.*, Case No. 2020CV337418 (Fulton Cty., GA Supreme Court) (collectively, “Plaintiffs”), on behalf of themselves and all others similarly situated, respectfully move this Court on a date and at such time as may be designated by the Honorable Brian M. Cogan, United States District Court for the Eastern District of New York, 225 Cadman Plaza East, Brooklyn, New York 11201, for entry of an Order: (i) preliminarily approving the terms of the Settlement between Plaintiffs and Crowe U.K. LLP (“Crowe”) as set forth in the Stipulation and Agreement of Partial Settlement, dated July 20, 2022 (“Stipulation”) submitted concurrently herewith; (ii) preliminarily certifying the Settlement Class; (iii) approving the form and method for providing notice of the Settlement; and (iv) setting a date for a final Settlement Hearing and deadlines for providing notice of the Settlement, the filing of Settlement Class Member objections, the filing of Settlement Class Member opt-out requests, the filing of Plaintiffs’ motion for final approval of the Settlement, and of Lead Counsel’s application for attorneys’ fees and expenses.

This motion is based on this Notice of Motion, the Stipulation and all exhibits attached thereto, Plaintiffs’ supporting Memorandum of Law, and all pleadings, records, and papers on file herein.

The [Proposed] Order Preliminarily Approving Partial Class Action Settlement and Providing for Notice, also attached as Exhibit A to the Stipulation, is submitted herewith.

Dated: July 20, 2022

THE ROSEN LAW FIRM, P.A.

/s/ Phillip Kim

Phillip Kim
Laurence M. Rosen
275 Madison Avenue, 40th Floor
New York, New York 10016
Telephone: (212) 6861060
Facsimile: (212) 202-3827
Email: pkim@rosenlegal.com
Email: lrosen@rosenlegal.com

*Lead Counsel for Federal Plaintiffs and the
Settlement Class*

GLANCY PRONGAY & MURRAY LLP

Lionel Z. Glancy
Robert V. Prongay
Casey E. Sadler
1925 Century Park East, Suite 2100
Los Angeles, California 90067
Telephone: (310) 201-9150
Facsimile: (310) 201-9160
Email: info@glancylaw.com

*State Court Lead Counsel for State Plaintiffs
and the Settlement Class*

CERTIFICATE OF SERVICE

I hereby certify that on this 20th day of July 2022, a true and correct copy of the foregoing document was served by CM/ECF to the parties registered to the Court's CM/ECF system.

/s/ Phillip Kim
Phillip Kim